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March 6, 2025

Via ECF
Honorable Allyne Ross
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, N.Y. 11201

Re: United States v. Feng Jiang
24-CR-264

Your Honor,

I represent defendant Feng Jiang in the above-referenced matter. I write to respectfully request permission for Mr. Jiang to travel for one night to St. Louis, MO this coming Sunday, March 9, 2025. Mr. Jiang is in full compliance with the terms of his bond and with his pre-trial services conditions.

Specifically, Mr. Jiang requests permission to travel on March 9, 2025, via Delta Airlines to St. Louis, MO, and return to New York the following day, March 10, 2025. Mr. Jiang will spend the night at the Hyatt located at 3154 Chestnut Street, St. Louis. The purpose of this trip is to look at a potential location to open a Tofu and BBQ restaurant.

Mr. Jiang and I have communicated this request and its details to PTS Officer Kadian Hammond, who does not object to it and will be provided with Mr. Jiang's full itinerary if this request is granted. I have also spoken with AUSA Patrick Campbell and he does not object to it.

Respectfully submitted,



David Scott Smith, Esq.

Cc: AUSA Patrick Campbell (via ECF)
PTS Officer Hammond (via email)